



communications
Integrated Systems

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September 30, 2005

Russell R. Marshall
Vice President
Operations

Marlene S. Dortch
Secretary
Federal Communications Commission
C/O Nantek, Inc.
236 Massachusetts Ave., Ste. 110
Washington, DC 20002

Federal Communications Commission
Office of Secretary

Re: IB Docket No. 04-286

Dear Ms. Dortch,

L-3 Communications Integrated Systems (L-3/IS) submits these comments in response to the Public Notice dated September 21, 2005 inviting comment on recommendations approved by the Commission's World Radio Council (WRC) Advisory Committee. In particular, L-3/IS would like to take this opportunity to express strong support for the document dealing with Agenda Item 1.5 on aeronautical telemetry (WAC/064).

L-3/IS is a leader in the major modification of DOD aircraft, particularly those that support the war on terrorism, Homeland Security, and other U.S. defense related activities. As part of our activities, flight testing of aircraft and systems plays a major role in the on time delivery of our product. Any delay in successful conclusion of flight testing is costly in direct outlay, but it also directly impacts the time-to-customer. Based on these factors, L-3/IS views with concern the shrinking supply of spectrum for Aeronautical telemetry. This is driven primarily by the fact that more and more data must be gathered on the performance of increasingly complex systems and subsystems in aircraft. In addition, customers are increasingly demanding high speed, color video which significantly increases the bandwidth requirements. This trend is complicated by the loss of over one-third of the spectrum previously allocated for flight test telemetry over the past 15 years which has been auctioned off by the Federal Government to support personal communications systems, etc. According to industry reports, nearly 20 percent of U.S. test flights have been delayed or repetitive flights flown due to lack of spectrum; this entails a major financial penalty for the competitiveness of U.S. manufacturers and extends the cycle for delivering products to the U.S. Government.

The proposed preliminary view meets the needs of securing globally harmonized spectrum to support Flight Testing in the future while protecting safety related communications. L-3/IS urges adoption of the preliminary view by the Commission. Of no less importance, it urges the Commission and its staff to give aid and assistance to U.S. manufacturers in overcoming the inevitable obstacles that the U.S. will encounter on the path to WRC 2007.

Sincerely,

Russell R. Marshall
Vice President
Operations
L-3 Communications/Integrated Systems

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